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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

WILLIENE JACKSON-JONES,
individually and on behalf of all others
situated,

Plaintiff

vs.

EPOCH EVERLASTING PLAY, LLC, a
Delaware limited liability company, and
AMAZON.COM SERVICES LLC, a
Delaware corporation,

Defendants.

Case No. 2:23-cv-02567-ODW-SK

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S RENEWED MOTION
FOR CLASS CERTIFICATION**

Date: December 22, 2025

Time: 1:30 p.m.

Judge: Hon. Otis D. Wright II

Crtrm.: 5D

**[PROPOSED] ORDER GRANTING RENEWED MOTION FOR CLASS
CERTIFICATION**

1 The Court, having read and considered the Renewed Motion for Class
2 Certification of Plaintiff Williene Jackson-Jones (“Plaintiff”) and all papers filed in
3 support thereof and in opposition thereto, and good cause appearing, hereby GRANTS
4 Plaintiff’s Renewed Motion for Class Certification, based on the following findings:

5 1. Numerosity: Since it would be impracticable to join thousands of persons
6 individually in this action, within the meaning of Fed. R. Civ. P. Rule 23(a)(1), the
7 Court finds the proposed class satisfies the numerosity requirement.

8 2. Typicality: Plaintiff’s claims and Defendants’ defenses are typical of the
9 claims of the proposed class and Defendants’ defenses thereto. The proposed class
10 satisfies Fed. R. Civ. P. Rule 23(a)(3).

11 3. Commonality and Predominance: Common questions of law or fact
12 predominate Plaintiff’s claims under the ‘unfair’ and ‘unlawful’ prongs of California’s
13 Unfair Competition Law (UCL), Cal. Bus. & Prof. C. §§ 17200, *et seq.*, and her claim
14 for unjust enrichment. The proposed class satisfies Fed. R. Civ. P. Rule 23(a)(2) and
15 (b)(3).

16 4. Adequacy: Plaintiff is a member of the proposed class and is able to fairly
17 and adequately protect the interests of members of the class. Furthermore, Plaintiff’s
18 chosen attorneys are capable of effectively prosecuting this litigation. Proposed Class
19 Counsel possess the necessary knowledge and experience in class action matters and
20 are adequate to act as Class Counsel. Plaintiff satisfies Fed. R. Civ. P. Rule 23(a)(4).

21 5. Class-wide Relief: Plaintiff’s demand for restitution under the UCL and
22 unjust enrichment can be determined on a class-wide basis.

23 6. Superiority: A class action is superior to other available methods for the
24 fair and efficient adjudication of the controversy alleged in the Complaint. Plaintiff
25 further satisfies Fed. R. Civ. P. Rule 23(b)(3).

26 IT IS HEREBY ORDERED THAT this case is certified to proceed to the merits
27 as a class action pursuant to Fed. R. Civ. P. Rule 23(b)(3) on all causes of action set
28 forth in Plaintiff’s Complaint (ECF No. 26) on behalf of the following Class: “All

1 persons in the State of California who purchased at least one of the Products, for
2 personal use and not for re-sale, since January 30, 2019.” For purposes of this Motion
3 and the proposed class definition, the term “Products” means all Calico Critters flocked
4 toys that were sold with a small part. A list of the Products is attached hereto as
5 Appendix A and Appendix B. Excluded from the Class are Defendants, their officers,
6 directors, agents, trustees, parents, children, corporations, trusts, representatives,
7 employees, successors, assigns, or other persons or entities related to or affiliated with
8 Defendants and/or their officers and directors and/or any of them. Also excluded from
9 the proposed Class are the Court, the Court’s immediate family and Court staff.

10 IT IS FURTHER ORDERED THAT Plaintiff Williene Jackson-Jones is
11 appointed as the Class Representative.

12 IT IS FURTHER ORDERED THAT the following attorneys are appointed class
13 counsel pursuant to Fed. R. Civ. P. Rule 23(g): Gillian L. Wade, Sara D. Avila, and
14 Marc A. Castaneda of the law firm Wade Kilpela Slade LLP; Jack Walker of the law
15 firm Martin Walker; and Justin R. Kaufman and Philip M. Kovnat of the law firm
16 Durham, Pittard & Spalding, LLP.

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19 Date: _____

Hon. Otis D. Wright II
Judge of the United States District Court
Central District of California